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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HEATHER STANLEY,  
  
Defendant.

CASE NO. 1:20-CR-00045-SKO-NONE

STIPULATION REGARDING DISCLOSURE  
OF SENSITIVE MATERIAL AND PERSONAL  
IDENTIFICATION INFORMATION

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Eastern District of California, and defendant HEATHER STANLEY (“defendant”), by and through her counsel of record, David Torres, hereby file this Stipulation Regarding Disclosure of Sensitive Materials and Personal Identification Information.

1. The government possesses, or may come to possess, recordings, documents, reports, or other materials the disclosure of which may ordinarily be required by the government’s Rule 16, Jencks Act, or Brady obligations, but the dissemination of which could pose a serious risk to certain defendants, witnesses, or the confidentiality of an ongoing investigation (the “Sensitive Materials”).

2. The government will mark all Sensitive Materials with the following stamp or inscription: “PROTECTIVE ORDER”

3. If the government distributes any document, compact disk, or other material bearing the above label, defense counsel and defendant agree to the following as to such material:

1           a.       Defense counsel shall not distribute Sensitive Materials to anyone other than his  
2 own legal staff (including paralegal assistants, legal secretaries, defense investigators, and lawyer-  
3 associates);

4           b.       Defense counsel shall not allow anyone other than himself and his legal staff to  
5 possess, or maintain possession of, any Sensitive Materials;

6           c.       Defense counsel or his legal staff may show defendant Sensitive Materials, but  
7 may not allow defendant to possess Sensitive Materials other than in the presence of defense counsel or  
8 his legal staff;

9           d.       Defendant shall not distribute the Sensitive Materials to anyone;

10          e.       Defense counsel and defendant may not disclose the contents of any Sensitive  
11 Materials publicly, including in any court filing, without first conferring with government counsel and,  
12 in any event, shall file any Sensitive Materials under seal.

13          4.       The parties agree to confer before filing any motions regarding the government's  
14 disclosure (or lack of disclosure) of Sensitive Materials.

15          5.       The evidence in this matter also includes personal identification information for others,  
16 including but not limited to names, addresses, dates of birth, social security numbers, and bank account  
17 numbers (collectively "personal information").

18          6.       This personal information is found throughout the discovery in this case, which includes,  
19 among other records, thousands of pages of records from banks, other financial institutions, businesses  
20 and law enforcement agencies.

21          7.       The parties stipulate, and request the Court to order, that only defense counsel, defense  
22 counsel's agents, and the defendant may review the unredacted personal information contained in the  
23 discovery, and that defense counsel, defense counsel's agents and the defendant may only use the  
24 unredacted personal information or any portion thereof for the specific purpose of preparing or  
25 presenting a defense in this matter and for no other purpose.

26          8.       The parties further stipulate, and request the Court to order, that only defense counsel and  
27 defense counsel's agents may make copies of any discovery containing unredacted personal information;  
28 and that the defendant may make copies for her own use only of any discovery containing unredacted

personal information that has been provided to her by her defense counsel or her defense counsel's agents, and may not release any such copies to any third party.

9. The parties further stipulate and request the Court to make its Order applicable to unredacted personal information contained in all of the discovery produced in this case, including any discovery produced after entry of its Order.

10. At the conclusion of this matter, defense counsel will collect and destroy any and all copies of documents and portions thereof containing the personal information that defense counsel possesses and/or has distributed to his agents and/or the defendant, except a copy set as necessary to maintain in defense counsel's case file.

11. Accordingly, the parties respectfully request that the Court adopt, and agree to be bound by, the corresponding protective order.

12. By signing this stipulation, the parties agree to be bound by the above terms, and those of the accompanying proposed order, before and after the Court executes and enters that order.

13. By signing this stipulation, counsel for defendant represents that he has discussed the contents of this stipulation and proposed order with defendant, and that defendant has no objection to this stipulation and the relief requested in the proposed order.

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Dated: April 13, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ ANGELA L. SCOTT  
ANGELA L. SCOTT  
Assistant United States Attorney

Dated: April 12, 2021

/s/ per email authorization  
DAVID A. TORRES  
Attorney for Defendant  
HEATHER STANLEY

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EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HEATHER STANLEY,  
  
Defendant.

CASE NO.

ORDER REGARDING  
GOVERNMENT'S DISCLOSURE OF SENSITIVE  
MATERIALS AND PERSONAL  
IDENTIFICATION INFORMATION

The Court has received and considered the jointly-filed Stipulation Regarding Disclosure of Sensitive Materials and Personal Identifying Information between Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Eastern District of California, and defendant HEATHER STANLEY, by and through his counsel of record, David A. Torres.

Good cause showing, IT IS HEREBY ORDERED THAT:

1. The government will identify the discovery materials in this case the disclosure of which could jeopardize the safety of witnesses or other persons or affect the confidentiality of ongoing investigations (the "Sensitive Materials").

2. The government will mark all Sensitive Materials with the following stamp or inscription: "PROTECTIVE ORDER"

3. If the government distributes any document, compact disk, or other material bearing the above label, defense counsel and defendant agree to the following as to such material:

1           a.       Defense counsel shall not distribute Sensitive Materials to anyone other than his  
2 own legal staff (including paralegal assistants, legal secretaries, defense investigators, and lawyer-  
3 associates);

4           b.       Defense counsel shall not allow anyone other than himself and his legal staff to  
5 possess, or maintain possession of, any Sensitive Materials;

6           c.       Defense counsel or his legal staff may show defendant Sensitive Materials, but  
7 may not allow defendant to possess Sensitive Materials other than in the presence of defense counsel or  
8 his legal staff;

9           d.       Defendant shall not distribute the sensitive materials to anyone;

10          e.       Defense counsel and defendant may not disclose the contents of any Sensitive  
11 Materials publicly, including in any court filing, without first meeting and conferring with government  
12 counsel, and, in any event, shall file any Sensitive Materials under seal.

13          4.       The parties must confer before filing any motions regarding the government's disclosure  
14 (or lack of disclosure) of Sensitive Materials.

15          5.       The evidence in this matter also includes personal identification information for others,  
16 including but not limited to names, addresses, dates of birth, social security numbers and bank account  
17 numbers (collectively "personal information").

18          6.       This personal information is found throughout the discovery in this case, which includes,  
19 among other records, thousands of pages of records from banks, other financial institutions, businesses  
20 and police departments.

21          7.       Only defense counsel, defense counsel's agents, and the defendant may review the  
22 unredacted personal information contained in the discovery. Defense counsel, defense counsel's agents  
23 and defendant may only use the unredacted personal information or any portion thereof for the specific  
24 purpose of preparing or presenting a defense in this matter and for no other purpose.

25          8.       Only defense counsel and defense counsel's agents may make copies of any discovery  
26 containing unredacted personal information; the defendant may make copies for her own use only of any  
27 discovery containing unredacted personal information that has been provided to her by her defense  
28 counsel or her defense counsel's agents, and may not release any such copies to any third party.

1           9.       At the conclusion of this matter, defense counsel will collect and destroy any and all  
2 copies of documents and portions thereof containing the personal information that defense counsel  
3 possesses and/or has made and distributed to his agents and/or defendant, except a copy set as necessary  
4 to maintain in defense counsel's case file.

5           10.     This Order shall apply to unredacted personal information contained in all discovery  
6 produced in this case, including any discovery produced after entry of this Order.

7  
8 IT IS SO ORDERED.

9 Dated: April 13, 2021

  
UNITED STATES MAGISTRATE JUDGE